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November 20, 2014

Anderson News LLC, et al., v. American Media Inc., et al.,  
09 CIV 2227 (PAC) (S.D.N.Y.)

Dear Judge Crotty:

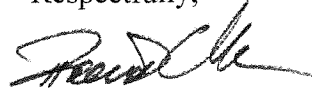
I write on behalf of all parties in the above-captioned matter.

The current scheduling order contemplates that dispositive motions and *Daubert* motions will be filed on December 15, 2014, but sets no briefing schedule. The parties have agreed on a briefing schedule, enclosed herewith in the form of a Sixth Stipulation and Proposed Order to Extend Civil Case Management Plan and Scheduling Order ("Revised CMO"). The existing Case Management Plan specifies a date for the submission of the final pretrial order on January 23, 2015. The parties propose to move that date until 60 days after the Court renders decision on the summary judgment and *Daubert* motions. If acceptable, we respectfully request that the Court enter the Revised CMO, which also has been filed with the Clerk's office.

In addition, the parties request a conference to address the following issues: (a) whether the parties are exempted from the Court's Individual Rule of Practice 3.D as to the summary judgment and *Daubert* motions, given that the original Case Management Plan already contemplates the filing of such motions, and (b) outstanding discovery issues. In connection with the latter, the Court previously advised the parties to bring all discovery disputes to the Court at one time. We are now at the point where there remain a small number of discovery issues the parties wish to raise with the Court, and we believe those could be handled expeditiously at a conference. We would propose, at least two days before the conference date, to submit a joint letter setting forth the remaining disputes and the parties' positions as to each.

Given the pendency of the December 15 date, the parties were contemplating the week of December 1 as a time for the conference; all counsel would be available December 5, if that is convenient for the Court, but will make ourselves available at such other time as the Court prefers.

Respectfully,

A handwritten signature in black ink, appearing to read "Rowan D. Wilson", with a stylized, flowing script.

Rowan D. Wilson

The Honorable Paul A. Crotty  
United States District Court, Southern District of New York  
500 Pearl Street  
Chambers 1350  
New York, NY 10007

BY E-FILING AND BY HAND

Copies to: All Counsel of Record (by email)